

**IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

NALCO COMPANY,)	
a Delaware corporation,)	
)	
Plaintiff/Counter-Defendant,)	
)	Case No. 07 C 6293
v.)	
)	Judge Hart
ENVIRO TECH CHEMICAL SERVICES,)	Magistrate Judge Cox
INC.,)	
a California corporation,)	
)	
Defendant/Counter-Plaintiff.)	JURY DEMANDED

JOINT MOTION FOR STIPULATED PROTECTIVE ORDER

Plaintiff/Counter-Defendant, Nalco Company ("Nalco"), and Defendant/Counter-Plaintiff Enviro Tech Chemical Services, Inc. ("Enviro Tech"), by and through their respective attorneys, respectively move this Court for a Protective Order pursuant to Fed. R. Civ. P. 26(c), and jointly state as follows:

1. Nalco and Enviro Tech each has business, engineering, financial, proprietary, technical and other information pertaining to the present action that is confidential or trade secret (hereinafter "Confidential Information").
2. Nalco and Enviro Tech anticipate that Confidential Information will be disclosed to the requesting party during the course of discovery for the present action.
3. The unauthorized or improper use of such Confidential Information will irreparably harm the party making such disclosure.

4. It is suitable that documents and information disclosed during discovery in this action be protected by an appropriate protective order to maintain the confidentiality or trade secret status of such documents or information.

5. Nalco and Enviro Tech do not believe that any third-party not directly involved in the present action would be unfairly prejudiced by the entry of an appropriate protective order to control the use and disclosure of certain documents and information in this action.

WHEREFORE, Plaintiff/Counter-Defendant, Nalco Company, and Defendant/Counter-Plaintiff Enviro Tech Chemical Services, Inc., respectfully request that this Court enter the Agreed Protective Order, in the form as attached hereto as Exhibit A.

NALCO COMPANY

By: s/ Joseph H. Herron

Alan L. Unikel
Joseph H. Herron
Seyfarth Shaw LLP
131 South Dearborn Street, Suite 2400
Chicago, IL 60603-5577
(312) 460-5000
Fax: (312) 460-7000

ENVIRO TECH CHEMICAL SERVICES,
INC.

By: s/ Audrey Millemann

Audrey A. Millemann
Weintraub Genshlea Chediak
400 Capitol Mall, 11th Floor
Sacramento, CA 95814
(916) 558-6000
Fax: (916) 446-1611

Suzanne M. Wallman
McDermott Will & Emery
227 West Monroe Street
Chicago, IL 60606-5096
(312) 372-2000
Fax: (312) 984-7700

CERTIFICATE OF SERVICE

I hereby certify that on April 2, 2008, I electronically filed the foregoing JOINT MOTION FOR STIPULATED PROTECTIVE ORDER, with the Clerk of the Court using the ECF system which will send notification of such filing to the following:

Audrey A. Millemann
Weintraub Genshlea Chediak
Law Corporation
400 Capitol Mall, 11th Floor
Sacramento, CA 95814
(916) 558-6000 – Main
(916) 446-1611 – Facsimile

Ms. Suzanne M. Wallmann
McDermott, Will & Emery
277 West Monroe Street
Chicago, Illinois 60606

s/ Joseph H. Herron
Joseph H. Herron
SEYFARTH SHAW LLP
131 South Dearborn Street, Suite 2400
Chicago, Illinois 60603
Telephone: (312) 460-5000
Facsimile: (312) 460-7000
e-mail: jherron@seyfarth.com